

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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IN RE:

TIMOTHY L. GARRISON,  
  
DEBTOR.

CHAPTER 13  
CASE NO. 10-20456-D  
SS# XXX-XX-6499

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MOTION TO MODIFY PLAN POST-CONFIRMATION  
TO FORGIVE MISSED PAYMENTS  
AND TO ADVANCE MORTGAGE PAYMENTS

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Comes now the debtor, by and through counsel, and hereby moves this Court to modify the plan post-confirmation to forgive payments missed under the Chapter 13 Plan and to advance the ongoing mortgage payments due under the Chapter 13 Plan. In support of said motion, Debtor would show unto the Court that he was temporarily unemployed and fell behind on the plan payments. Debtor has now obtained new employment and sending in the plan payments to the Chapter 13 Trustee's Office. Further, Debtor would show unto the Court that as a result the mortgage payments to GMAC Mortgage, P.O. Box 4622, Waterloo, IA 50704, were not made. Debtor proposes that the ongoing monthly payments be advanced three months.

WHEREFORE, PREMISES CONSIDERED, Debtor prays that this matter be set for a hearing, that the Court enter an order forgiving the payments missed, that the court modify the plan post-confirmation to advance the ongoing mortgage payments three months, and that the Chapter 13 Trustee modify the plan payments accordingly.

Respectfully submitted,

/s/ Jimmy E. McElroy #011908  
Attorney for Debtor(s)  
3780 S. Mendenhall  
Memphis, TN 38115

Certificate of Service

The undersigned certifies that the above motion was mailed VIA United State Postal Service to all parties listed below on July 31, 2012.

/s/Jimmy E McElroy

Debtor(s)  
Debtor's Attorney  
Case Trustee  
All Entities on Matrix  
GMAC Mortgage, P.O. Box 4622, Waterloo, IA 50704